

U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION X

1200 SIXTH AVENUE  
SEATTLE, WASHINGTON 98101

COPY

DEC 12



REPLY TO  
ATTN OF:

Mail Stop 514

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

DEC 8 1978

Mr. Bruce W. Johnson, President  
Chem-Nuclear Systems, Inc.  
10602 N.E. 38th Place  
Kirkland, Washington 98033

Re: Modification of PCB Disposal Site Approval Letter for  
Arlington, Oregon Facility

Dear Mr. Johnson:

During discussions with Chem-Nuclear representatives on November 14 and 20, 1978, concerning violations of EPA's PCB Disposal Site Approval Letter for your Arlington, Oregon facility, several issues were raised which indicated a need for clarification of the terms and conditions of Part C ("Special Conditions") of that approval letter. New language for several of the conditions was discussed and agreed upon with Mr. Wicks of Chem-Nuclear on November 20, and we believe that Part C, as modified, will make your vital job more efficient and easier.

Among the major revisions, Special Condition No. 1 has been rewritten to tie into the definition of PCBs in 40 CFR 761.2 and to require storage of PCBs at the site in compliance with 40 CFR 761.42 (Storage for Disposal). Compliance with this latter section was, of course, previously required, but is now made explicit. Special Condition No. 7 has been rewritten to permit reuse of dedicated PCB shipping containers. Special Condition No. 9 has been rewritten to require a written record of anything deposited in the northerly 150 feet of Trench 5. Further, the "cell" concept has been eliminated, as three-dimensional burial coordinates should be sufficiently definitive for locational purposes.

Accordingly, pursuant to the authority of TSCA § 6(e)(1), 40 CFR 761.41(c)(3)(ii), and Special Condition 2 of Part C of Chem-Nuclear's Approval Letter, signed by me on June 30,


-2-

1978, Part C of that Approval Letter is hereby deleted and a new Part C, attached hereto, is substituted, effective today. Please note that today's modification in no way affects Parts A and B of Chem-Nuclear's Approval Letter, which remain in full force and effect.

Should you have any questions, Mr. Michael Garcia, Staff Attorney assigned to this matter, will be pleased to respond. He can be reached at (206) 442-1275.

Thank-you for your cooperation.

Sincerely,

  
Donald P. Dubois  
Regional Administrator

Enclosure

cc: William Young, Oregon DEQ  
John Vlastelicia, Oregon Operations Office

Part C. Special Conditions

- (1) PCBs as defined by 40 CFR § 761.2 (incorporated herein by reference) shall be disposed of as provided by 40 CFR § 761.10, and all terms and conditions of this approval letter. PCBs shall be disposed of only in the northerly 150 feet of Trench 5, located in SW 1/4, SE 1/4, Section 25, T.2.N., R.20 E.W.M., Gilliam County, Oregon. PCBs received at the Chem-Nuclear Arlington facility shall be stored in compliance with 40 CFR § 761.42 until disposed of.
- (2) Approval of the above described site will be continued until January 1, 1980, unless otherwise extended or modified.
- (3) Access to the disposal site during normal working hours for the purpose of EPA inspections and sampling conducted pursuant to Section 11 of the Toxic Substances Control Act shall not be denied.
- (4) Roads shall be maintained on the site which are adequate to operate and maintain the site without causing safety or nuisance problems or hazardous conditions.
- (5) The disposal site shall be operated and maintained in full compliance with all terms and conditions of this approval letter and in a manner to prevent safety problems or hazardous conditions resulting from spilled liquids or windblown materials.
- (6) The floor of the northerly 150 feet of Trench 5 shall be covered with a one-foot thick layer of charcoal and the charcoal covered with a one-foot layer of earth prior to placement of PCB wastes.
- (7) PCB non-liquid materials and PCB liquids in capacitors shall be buried in the containers in which they are received or stored. PCB shipping containers permanently dedicated and labelled for use solely for shipping PCB articles may be returned for reuse provided that all free liquid is removed and placed in storage and any remaining liquid is removed by sorbtion onto charcoal, with subsequent disposal of such charcoal into the northerly 150 feet of Trench 5.
- (8) In no event shall PCB containers be dumped or pushed into Trench 5 from the lip of the trench.

(9) No PCB wastes, nor wastes or materials of any kind, shall be placed or disposed of in the northerly 150 feet of Trench 5 unless a written record of the placing or disposal of such waste or material is made contemporaneously. The exact location of each waste shall be included in the record with respect to a permanent, surveyed referenced monument. The nature of each waste or material, including whether such waste is a PCB mixture (such as PCB contaminated charcoal), PCB article, PCB container, or PCB equipment, shall also be included in the record. Such records shall also include three dimensional burial coordinates.

(10) No materials, other than PCB materials, shall be placed in the northerly 150 feet of Trench 5, with the exception that non-liquid wastes that are determined before disposal to be chemically compatible with PCBs may be placed above the uppermost PCB materials. All waste will be buried at least three feet below the natural land surface. Chemical compatibility shall be determined solely by EPA Region 10 upon written application made by the operator for each planned disposal of wastes alleged to be chemically compatible with PCBs. Such application shall include a description of the chemical components in the waste, the quantity of the waste to be disposed, and the method of disposal. Applications shall be addressed to the Region 10 Solid Waste Management Program. In addition, a permanent record of the type and quantity of non-PCB wastes shall be maintained.

(11) With the exception of PCBs contained in capacitors or nonremovable residual liquids in other PCB containers, no other PCB liquids, whether containerized or not, shall be disposed of in Trench 5. Also, no other liquids shall be disposed of in Trench 5 unless a substantially impermeable dike, having a width of at least 10 feet, is placed between the PCB disposal area and the remainder of Trench 5.

(12) The land surface around Trench 5 shall be graded or trenched to prevent any overland runoff from flowing into the PCB landfill.

(13) Upon final closure of the northerly 150 feet of Trench 5, it shall be covered with a layer of compacted earth which extends a minimum of three feet below the natural land surface.

(14) The two ground water monitor wells (the site water well and the office water well) shall be sampled monthly and analyzed for the following parameters:

- a. PCBs (detectability to 10 to 30 ppt)
- b. pH
- c. Specific Conductance
- d. Total Chlorinated Organics (detectability to 1.0 ppm)
- e. Chlorides (detectability to 1.0 ppm)

Samples from each well shall be taken from a point located between the well pump and the pressure tank.

(15) Test wells B<sub>3</sub> and B<sub>4</sub>, shown on attachment B to the technical report submitted by Chem-Nuclear System, Inc., on March 10, 1978, and the three observation wells in Trench 5 shall be checked monthly for the presence of liquid in the well bore. If any liquid is detected, a sample shall be taken and analyzed for the following parameters:

- a. PCBs (detectability to 1.0 ppb)
- b. pH
- c. Specific Conductance
- d. Total Chlorinated Organics (detectability to 1.0 ppm)
- e. Chlorides (detectability to 1.0 ppm)

(16) The two ground water wells (the site water well and the office water well) shall be sampled on a frequency of no less than once every six months for a period of ten years after final closure of the disposal site and the samples analyzed as required in Special Condition 14.

(17) Sampling methods and analytical procedures for the parameters specified in Special Condition 14 shall be as described in 40 CFR Part 136 as amended in 41 FR 52779 on December 1, 1976. In addition, any laboratory performing chemical tests for the operator of the disposal site shall be participating in EPA's Quality Assurance Program for analytical quality control.

(18) All monitoring results obtained pursuant to Special Conditions 14, 15 and 16 shall be recorded in writing contemporaneously, and such written records shall be submitted monthly to the Solid Waste Management Program, EPA Region 10, M/S 530, 1200 Sixth Avenue, Seattle, Washington 98101.

(19) All data and the results of sampling and analysis shall be recorded in writing contemporaneously, and such written records shall be maintained as specified in Annex VI (b) (40 CFR 761.45(b)).

(20) The operator of the disposal site shall immediately report to the Regional Administrator any detection of PCBs in the samples obtained as a result of any of the monitoring activity described in Special Conditions 14, 15 and 16.

(21) The monthly report specified in Special Condition 18 shall include a summary of any spilled PCB material received during the month. The summary should include the spilled material source, the shipper and the quantity delivered.

#### NOTICE

Pursuant to section 15(1) and 16(a) of TSCA, [15 USCA §§ 2614 and 2615(a)] the recipient hereof is advised that penalties not to exceed \$25,000 per day may be administratively assessed for any failure to comply with requirements of this document imposed by the authority of, or the regulations prescribed pursuant to, section 6(e) of the Toxic Substances Control Act [15 USCA § 2605(e)].